

Mark E. Merin (State Bar No. 043849)  
Paul H. Masuhara (State Bar No. 289805)  
LAW OFFICE OF MARK E. MERIN  
1010 F Street, Suite 300  
Sacramento, California 95814  
Telephone: (916) 443-6911  
Facsimile: (916) 447-8336  
E-Mail: mark@markmerin.com  
paul@markmerin.com

Attorneys for Plaintiffs  
ESTATE OF DEREK VALENTINE,  
ARACELI SANCHEZ, L.V., C.V., M.V.,  
RUTH RAMIREZ, and ALBERT VALENTINE

**P O R T E R | S C O T T**

A PROFESSIONAL CORPORATION  
Carl L. Fessenden, SBN 161494  
cfessenden@porterscott.com  
Matthew W. Gross, SBN 324007  
mgross@porterscott.com  
2180 Harvard Street, Suite 500  
Sacramento, California 95815  
TEL: 916.929.1481  
FAX: 916.927.3706

Attorneys for Defendants  
COUNTY OF MERCED, MERCED COUNTY  
SHERIFF'S OFFICE, and VERNON WARNKE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

ESTATE OF DEREK VALENTINE, ARACELI  
SANCHEZ, L.V., C.V., M.V., RUTH RAMIREZ,  
and ALBERT VALENTINE,

Plaintiffs,

vs.

COUNTY OF MERCED, MERCED COUNTY  
SHERIFF'S OFFICE, VERNON WARNKE,  
CALIFORNIA FORENSIC MEDICAL GROUP  
dba WELLPATH, and DOE 1 to 20,

Defendants.

LINDSEY M. ROMANO (SBN: 337600)  
lromano@grsm.com  
GORDON REES SCULLY MANSUKHANI, LLP  
275 Battery Street, Suite 2000  
San Francisco, CA 94111  
Telephone: (415) 875-4126  
Facsimile: (415) 986-8054

Attorneys for Defendant  
CALIFORNIA FORENSIC MEDICAL GROUP  
dba WELLPATH

Case No. 1:23-cv-01697-JLT-SAB

**STIPULATION FOR FILING  
FIRST AMENDED COMPLAINT  
AND RESPONSIVE PLEADINGS**

1 The Estate of Derek Valentine, Araceli Sanchez, L.V., C.V., M.V., Ruth Ramirez, and Albert  
2 Valentine (collectively, “Plaintiffs”); the County of Merced, Merced County Sheriff’s Office, and  
3 Vernon Warnke (collectively, “County Defendants”); and California Forensic Medical Group dba  
4 Wellpath (“Wellpath”) submit the following stipulation.

5 WHEREAS, Plaintiffs seek to file a First Amended Complaint pursuant to Federal Rule of Civil  
6 Procedure 15(a)(2);

7 WHEREAS, County Defendants and Wellpath’s responsive pleadings to an amended pleading  
8 would be due within 14 days after filing of the amended pleading pursuant to Federal Rule of Civil  
9 Procedure 15(a)(3);

10 WHEREFORE, Plaintiffs, County Defendants, and Wellpath’s counsel have met-and-conferred  
11 and reached an agreement as to the filing of an amended pleading and responsive pleadings; and

12 Now, THEREFORE, Plaintiffs, County Defendants, and Wellpath STIPULATE that:

13 1. Plaintiffs shall have leave to file a First Amended Complaint pursuant to Federal Rule of  
14 Civil Procedure 15(a)(2); and

15 2. County Defendants and Wellpath shall have a 28-day extension of time to file responsive  
16 pleadings to the First Amended Complaint pursuant to Local Rule 144(a), in addition to the 14-day  
17 deadline pursuant to Federal Rule of Civil Procedure 15(a)(3).

18 IT IS SO STIPULATED.

19 Dated: June 24, 2024

Respectfully Submitted,  
LAW OFFICE OF MARK E. MERIN

*/s/ Mark E. Merin*

22 By: \_\_\_\_\_

Mark E. Merin

Paul H. Masuhara

Attorneys for Plaintiffs  
ESTATE OF DEREK VALENTINE,  
ARACELI SANCHEZ, L.V., C.V., M.V.,  
RUTH RAMIREZ, and ALBERT VALENTINE

1 Dated: June 25, 2024

Respectfully Submitted,

**P O R T E R | S C O T T**

*/s/ Matthew W. Gross*

(as authorized on June 25, 2024)

By: \_\_\_\_\_

Carl L. Fessenden

Matthew W. Gross

Attorneys for Defendants

COUNTY OF MERCED, MERCED COUNTY

SHERIFF'S OFFICE, and VERNON WARNKE

9 Dated: June 24, 2024

Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI, LLP

*/s/ Allison Becker*

(as authorized on June 24, 2024)

By: \_\_\_\_\_

Lindsey M. Romano

Allison Becker

Attorneys for Defendant

CALIFORNIA FORENSIC MEDICAL GROUP

dba WELLPATH